

CC Docket No. 94-102 – Status Report

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Date: February 1, 2006

To: Marlene H. Dortch, Secretary
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Washington, D.C. 20554

By Electronic Submission:

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STATUS REPORT
Due February 1, 2006
CC Docket No. 94-102

Keystone Wireless, L.L.C. ("Keystone") hereby submits its E911 Status Report, pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver of Deadlines for Implementation of Phase II E911 of Key Communications, LLC and Keystone Wireless, LLC*, CC Docket No. 94-102, *Order*, 20 FCC Rcd 16927 ¶19 (2005).

Carrier Identifying Information:

Carrier Name: Keystone Wireless, L.L.C. – FRN 0007 4157 06

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Information Regarding PSAPs:

As of Keystone's November 21, 2005 Supplement to its Phase II E-911 waiver request (hereinafter, "Supplement"), Keystone had received three Phase I requests and three Phase II requests. Keystone has received one new Phase I/Phase II PSAP request, from the Centre County PSAP. As previously reported in the Supplement, Keystone obtained and installed all of the network equipment and software necessary to meet the Phase I request from the Berks County PSAP, and is compliant with Phase I in that county. Keystone also reported that it was actively working with the Schuylkill County PSAP to complete the second Phase I deployment in that county using a NCAS solution. Keystone will complete that deployment within the next two months, and at that point will be fully Phase I compliant in that county. Keystone is actively working with the Lycoming County and Center County PSAPs to deploy Phase I E-911 in their respective counties.

Keystone has kept the Berks County and Schuylkill County PSAPs updated on its progress in implementing a Phase II E-911 solution in their respective counties, and provided each of them with a copy of the Supplement. Keystone asked each of these two PSAPs to contact Keystone if they had any concerns or questions respecting the delay in implementation of Phase E-911. Keystone has not heard back from either of these PSAPs, and interprets their silence as consent to Keystone's Phase II E-911 implementation efforts.

Keystone has also advised both the Centre County and Lycoming County PSAPs of the current situation with the implementation of Phase II E-911 in their respective counties, that Keystone has requested a waiver from the FCC of the Phase II implementation requirements, and provided each of these PSAPs with copies of the original waiver request and the Supplement. Both of these PSAPs have expressed satisfaction with Keystone's efforts to implement Phase II E-911, and have stated that they do not object to Keystone's request for waiver of the Phase II implementation requirements. *See* attached Exhibits A and B.

Implementation of Phase II Service:

As stated in Keystone's Supplement, Keystone is now committed to using a network-based solution for Phase II E-911 in its market. Keystone has been exploring two network-based solutions currently in development: the Wireless Location Signature ("Polaris WLS") being developed by Polaris Wireless, Inc. ("Polaris"), and The Compass™ Location System ("The Compass™") being developed by GBSD Technologies, Inc. ("GBSD"). Keystone provided Polaris with basic information respecting Keystone's network, and Polaris conducted a preliminary analysis based on the Polaris WLS technology. While not willing to put any of its analysis results in writing, Polaris has orally advised Keystone that Polaris is not willing to take any steps toward modeling Keystone's market with the Polaris WLS solution, because it feels that the Polaris WLS technology would not even come close to meeting the Phase II E-911 accuracy requirements under §20.18(h) of the Commission's rules with Keystone's current network configuration.

GBSD is still not ready to conduct an analysis of Keystone's network based on The Compass™ technology. GBSD advises that it wants to submit its First Office Application ("FOA") results to the FCC before doing so. GBSD advised Keystone that GBSD anticipates doing so the first part of February, 2006. GBSD has promised to contact Keystone when it has submitted the FOA results to the FCC, at which time GBSD will begin analyzing the feasibility of employing The Compass™ solution within Keystone's network.

In light of the current situation with the Polaris WLS and GBSD's slow pace in initiating its analysis of The Compass™ in Keystone's network, Keystone does not anticipate that Phase II E-911 service will be available in its network in the near future, although Keystone is continuing to work toward a target date of December 31, 2006, for implementation of a Phase II E-911 solution within its network. Keystone also is continuing to reevaluate the traditional network-based Phase II solutions and any other new network-based solutions in development, to determine if any are or have become viable solutions for its market.

Construction of New Cells and Expansion of Coverage:

Keystone is currently finalizing its 2006 build-out plans for its network. Keystone is unable to do too much construction during the winter months, due to the generally inclement weather in its market. Keystone anticipates that it will be some time in the late second quarter or early third quarter of the year before any new sites begin operating.